

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MARLENE HOPKINS, Individually, as  
Wrongful Death Heir, and as Successor-in-  
Interest to NORMAN HOPKINS, JR.,  
Deceased; and MICHELLE HOPKINS, and  
MICHAEL HOPKINS, as Legal Heirs of  
NORMAN HOPKINS, Deceased, THE  
FLINTKOTE COMPANY, THE OFFICIAL  
COMMITTEE OF THE ASBESTOS  
PERSONAL INJURY CLAIMANTS, and  
JAMES J. MCMONAGLE as the LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS PERSONAL INJURY  
CLAIMANTS

Plaintiffs,

vs.

PLANT INSULATION COMPANY;  
UNIROYAL HOLDING, INC.; IMPERIAL  
TOBACCO CANADA LIMITED;  
SULLIVAN & CROMWELL LLP; and  
DOES 1 through 100,

Defendants.

Civil Action No. \_\_\_\_\_

**FED. R. CIV. P. 7.1 CORPORATE DISCLOSURE STATEMENT**

**NOW COMES** Imperial Tobacco Canada Limited ("ITCAN"), by and through its undersigned counsel, pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and hereby makes and files this Corporate Disclosure Statement, showing this Court that:

1. ITCAN is a direct, wholly owned subsidiary of British American Tobacco Holdings (Canada) B.V.;
2. British American Tobacco Holdings (Canada) B.V. is an indirect, but wholly-owned, subsidiary of B.A.T Industries p.l.c.; and

3. There is no publicly-held corporation that owns 10% or more of the stock of B.A.T Industries p.l.c.

This 5<sup>th</sup> day of May, 2006.

Respectfully submitted,

MORRIS, JAMES, HITCHENS & WILLIAMS  
LLP



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Stephen M. Miller (#2610)  
Brett D. Fallon (#2480)  
222 Delaware Avenue, 10<sup>th</sup> Floor  
Post Office Box 2306  
Wilmington, Delaware 19899-2306  
Telephone: (302) 888-6800  
Telecopier: (302) 571-1750  
E-mail: smiller@morrisjames.com

and

KING & SPALDING LLP  
L. Joseph Loveland  
James A. Pardo, Jr.  
Mark M. Maloney  
1180 Peachtree Street, N.E.  
Atlanta, Georgia 30309  
Phone: 404-572-4600  
Fax: 404-572-5141  
jloveland@kslaw.com  
jpardo@kslaw.com  
mmaloney@kslaw.com

Attorneys for Defendant Imperial Tobacco Canada  
Limited

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MARLENE HOPKINS, Individually, as )  
Wrongful Death Heir, and as Successor-in- )  
Interest to NORMAN HOPKINS, JR., )  
Deceased; and MICHELLE HOPKINS, and )  
MICHAEL HOPKINS, as Legal Heirs of )  
NORMAN HOPKINS, Deceased, THE )  
FLINTKOTE COMPANY, THE OFFICIAL )  
COMMITTEE OF THE ASBESTOS )  
PERSONAL INJURY CLAIMANTS, and )  
JAMES J. MCMONAGLE as the LEGAL )  
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TOBACCO CANADA LIMITED; )  
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DOES 1 through 100, )

Defendants.

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**AFFIDAVIT OF REBECCA WORKMAN, PARALEGAL**

STATE OF DELAWARE :  
: SS:  
NEW CASTLE COUNTY :

I, Rebecca Workman, certify that I am, and at all times during the service, have been an employee of Morris, James, Hitchens & Williams LLP, not less than 18 years of age and not a party to the matter concerning which service was made. I certify further that on May 5, 2006, I caused to be served:

**FED. R. CIV. P. 7.1 CORPORATE DISCLOSURE STATEMENT**

Service was completed upon parties on the attached list in the manner indicated thereon.

Date: May 5, 2006.

Rebecca Workman  
Rebecca Workman

SWORN AND SUBSCRIBED before me this 5<sup>th</sup> day of May, 2006.

[Signature]  
NOTARY

Notary Public for the State of Delaware  
My Comm. Expires 12/31/2007

**VIA FIRST CLASS MAIL**

Gilbert L. Purcell, Esquire  
Brayton Purcell, LLP  
222 Rush Landing Road  
Novato, CA 94948-6169  
(Attorneys for Plaintiff Marlene  
Hopkins, Michelle Hopkins, and  
Michael Hopkins)

Stephen M. Snyder, Esquire  
Snyder Miller & Orton LLP  
111 Sutter Street, Suite 1950  
San Francisco, CA 94104  
(Attorneys for Plaintiffs The  
Flintkote Company, The  
Official Committee of Asbestos  
Personal Injury Claimants, and  
James J. McMonagle as the  
Legal Representative for Future  
Asbestos Personal Injury Claimants)

Eliot S. Jubelirer, Esquire  
Jean L. Bertrand, Esquire  
Morgenstein & Jubelirer  
One Market, Spear Street Tower  
Thirty-Second Floor  
San Francisco, CA 94105  
(Additional Counsel for Plaintiffs)

Alan Pedlar, Esquire  
The Law Office of Alan Pedlar  
1112 Via Malibu  
Aptos, CA 95083  
(Additional Counsel for Plaintiffs)

Kelly C. Wooster, Esquire  
112 Rock Creek Court  
P.O. Box 62  
Copperopolis, CA 95228  
(Additional Counsel for Plaintiffs)

**VIA FIRST CLASS MAIL**

Kevin T. Lantry  
Jeffrey E. Bjork  
Sidley Austin LLP  
555 West Fifth Street  
Los Angeles, CA 90013  
Attorneys for The Flintkote Company

Gregory D. Phillips  
Rohit K. Single  
Brad D. Brian  
Munger, Tolles & Olson LLP  
355 South Grand Avenue, 35<sup>th</sup> Floor  
Los Angeles, CA 90071  
Attorneys for Sullivan & Cromwell

Monte S. Travis  
Travis & Pon  
2001 Fillmore Street  
San Francisco, CA 94115-2708  
Attorneys for Plant Insulation

Nancy E. Hudgins  
565 Commercial Street, 4<sup>th</sup> Floor  
San Francisco, CA 94111  
Attorneys for Uniroyal Holdings, Inc.

**VIA HAND DELIVERY**

Laura Davis Jones  
James E. O'Neill, III  
Pachulski Stang Ziehl Young Jones &  
Weintraub LLP  
919 North Market Street, 17<sup>th</sup> Floor  
Post Office Box 8705  
Wilmington, DE 19899-8705  
Attorneys for The Flintkote Company

**VIA HAND DELIVERY**

Marla Eskin, Esquire  
Kathleen Campbell, Esquire  
Campbell & Levine, LLC  
800 N. King Street, Suite 300  
Wilmington, DE 19801  
(Counsel for the Official Committee of  
Creditors)

James L. Patton, Jr., Esquire  
Edwin J. Harron, Esquire  
Young Conaway Stargatt & Taylor LLP  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, DE 19899-0391  
(Counsel to Legal Representative)